

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LAKISHA REYNOLDS, *et al.*,

Plaintiffs,

-against-

98 Civ. 8877

RUDOLPH GIULIANI, *et al.*,

Defendants.

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PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of Plaintiffs' Motion for Civil Contempt; the Declaration of Abby Biberman dated December 18, 2023 and the exhibits annexed thereto; the Declaration of Laquena Watson dated December 17, 2023, the Declaration of Mary Metayer dated December 16, 2023; and upon all prior pleadings, Plaintiffs, by their counsel New York Legal Assistance Group, National Center for Law and Economic Justice, Northern Manhattan Improvement Corporation, and The Legal Aid Society will move this Court at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York for an order:

1. Restoring the proceeding to the Court's calendar;
2. Adjudging New York City Defendants, in civil contempt of this Court's prior Order dated December 14, 2005, requiring City Defendants to provide timely Expedited Supplemental Nutrition Assistance Program ("SNAP") benefits and Immediate Needs Grants to eligible households, and to provide Plaintiffs' Counsel with regular monitoring data documenting the timely provision of these benefits;

3. Directing New York City Defendants to take the necessary corrective action to bring them in compliance with the 2005 Order by January 19, 2024; and
4. Awarding attorneys' fees to Plaintiffs' Counsel.

WHEREFORE, as more fully discussed in the Memorandum in Support of Plaintiffs' Motion for Contempt, Plaintiffs by their undersigned attorneys hereby respectfully ask that the Court grant the requested relief.

Dated: December 18, 2023
New York, New York

Respectfully submitted,

/s/ Saima Akhtar

Saima Akhtar
**NATIONAL CENTER FOR LAW AND
ECONOMIC JUSTICE**
50 Broadway, Suite 1500
New York, NY 10004
Tel: (646) 558-6152
akhtar@nclej.org

/s/ Abby Biberman

Abby Biberman
Kate Fetrow
Julia Russell
NEW YORK LEGAL ASSISTANCE GROUP
100 Pearl St., 19th Floor
New York, NY 10004
Tel: (212) 613-5000
abiberman@nylag.org
kfetrow@nylag.org
jrussell@nylag.org

/s/ Rodrigo Sanchez-Camus

Rodrigo Sanchez-Camus
Jesenia Ponce
**NORTHERN MANHATTAN IMPROVEMENT
CORPORATION**

45 Wadsworth Avenue, 6th Floor
New York, NY 10033
Tel: (212) 822-8300
rodrigossanchez@nmic.org
jeseniaponce@nmic.org

/s/ Emily Lundgren
Emily Lundgren
Kathleen Kelleher
Judith Goldiner
Edward Josephson
Anne Callagy
Susan Welber
Camille Zentner
THE LEGAL AID SOCIETY
49 Thomas Street, 5th Floor
New York, NY 10013
(212) 298-5232
elundgren@legal-aid.org
kkelleher@legal-aid.org
jgoldiner@legal-aid.org
ejosephson@legal-aid.org
acallagy@legal-aid.org
sewelber@legal-aid.org
czentner@legal-aid.org